

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules To)	
Ensure Compatibility with Enhanced 911)	CC Docket No. 94-102
Emergency Calling Systems)	
)	
Request for Waiver By Southern)	
Communications Services d/b/a)	
SouthernLINC Wireless)	

To: The Commission

SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:

MAY 1,2007

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Dated: May 1,2007

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MAY 1,2007**

Pursuant to the *Order* of the Federal Communications Commission ("FCC" or "Commission") of February 12,2007,¹ Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") hereby provides the Commission its quarterly report regarding the status of its efforts to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its subscribers pursuant to Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v).

¹ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Further Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, DA 07-659 (rel. Feb. 12,2007) ("*Order*") (granting SouthernLINC Wireless until November 12, 2007, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and requiring the filing of quarterly status reports).

I. BACKGROUND

On July 26, 2005, SouthemLINC Wireless, a “qualified Tier III carrier” as that term is defined in Section 107 of the *ENHANCE 911 Act*,² submitted a Request for Waiver seeking a limited extension of the Commission’s December 31, 2005, handset deployment deadline to allow SouthernLINC Wireless an additional twenty-four months to achieve ninety-five percent penetration of location-capable handsets among its subscriber base.³ As set forth in the Request for Waiver and subsequent filings, SouthernLINC Wireless faces numerous challenges in its efforts to achieve the required level of penetration of location-capable handsets, including (i) a latent software defect in the Motorola A-GPS-equipped handsets used by SouthernLINC Wireless subscribers that rendered all A-GPS services in these handsets unusable for E911 location in July 2004; (ii) the substantial portion of handsets assigned to enterprise or government accounts that typically have long-term equipment replacement cycles and are both reluctant and resistant to upgrading from their current handsets to new location-capable handsets; and (iii) the number of SouthemLINC Wireless subscribers who utilize and rely on the range and coverage of higher-power 1 watt and 3 watt phones and who are unwilling to upgrade to a lower-power (0.6 watt) location-capable handset, which could decrease their ability to receive any communications services – including emergency services – in remote areas.⁴

² / National Telecommunications and Information Administration Organization Act – Amendment, Publ. L. No. 108-494, 118 Stat. 3986 (1994) (“*ENHANCE 911 Act*”).

³ / Request for Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 26, 2005 (“Request for Waiver”).

⁴ / See, e.g., Request for Waiver at 2 – 3; See also SouthernLINC Wireless Notice of Ex Parte Presentation, CC Docket No. 94-102, filed September 9, 2005; SouthemLINC Wireless Response to Request for Additional Information Supporting its Request for

On November 3, 2005, the Commission granted SouthernLINC Wireless a limited ten-month extension of the ninety-five percent handset penetration deadline and required SouthernLINC Wireless to file status reports on a quarterly basis.⁵ On December 5, 2005, SouthernLINC Wireless filed a Petition for Reconsideration and Clarification of the 2005 *Order*.⁶ This Petition is still pending before the Commission, and SouthernLINC Wireless clarifies that all subsequent filings it has made in this docket – including the instant Quarterly Report – have been submitted separate from and without prejudice to its pending Petition.

On July 24, 2006, SouthernLINC Wireless filed its first Request for Further Waiver, seeking an additional extension of the ninety-five percent penetration deadline until December 31, 2007.⁷ On October 20, 2006, SouthernLINC Wireless submitted a request to the Commission for leave to withdraw without prejudice its Request for Further Waiver so that it could provide the Commission with additional relevant information on SouthernLINC Wireless' compliance efforts.⁸

Waiver of the E911 Phase II Handset Deployment Deadline, CC Docket No. 94-102, filed Oct. 26, 2005 (“Supplemental Filing”).

⁵ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, FCC 05-188 (rel. Nov. 3, 2005) (“2005 Order”) (granting SouthernLINC Wireless until November 3, 2006, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and imposing certain conditions on the grant of waiver).

⁶ / Petition for Reconsideration and Clarification of SouthernLINC Wireless, CC Docket No. 94-102, filed December 5, 2005 (“Petition”).

⁷ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 24, 2006 (this Request was subsequently withdrawn).

⁸ / See SouthernLINC Wireless Request for Further Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, CC Docket No. 94-102, filed Oct. 20, 2006 (“Withdrawal Request”).

On November 2, 2006, SouthernLINC Wireless filed its revised Request for Further Waiver.⁹ On February 12, 2007, the Commission released its *Order* granting SouthernLINC Wireless a limited extension until November 12, 2007, of the ninety-five percent handset penetration deadline and requiring SouthernLINC Wireless to file status reports on a quarterly basis.

11. INFORMATION REGARDING THE STATUS OF SOUTHERNLINC WIRELESS' E911 PHASE II DEPLOYMENT EFFORTS

In accordance with the *Order*,¹⁰ SouthernLINC Wireless provides the Commission with the following information regarding its E911 Phase II deployment status and efforts.

A. Number and Status of Phase II Requests from PSAPs

As of April 30, 2007, SouthernLINC Wireless had received 127 requests for Phase II service out of a total of 298 PSAPs in its service territory. SouthernLINC Wireless has completed deployment in response to 117 of these requests, with 10 requests still pending. Of these 10 pending requests, three requests have extended past the six month deadline. One of these requests has extended past the six month deadline due to equipment issues on the part of the PSAP. SouthernLINC Wireless has remained in regular communication with this PSAP and is ready to complete Phase II service deployment as soon as the PSAP resolves its equipment issues. The other two requests have extended past the six month deadline because the PSAPs have advised SouthernLINC Wireless that they are awaiting extended ALI provisioning into the selective router by the incumbent local exchange carrier. An additional request may also

⁹ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed November 2, 2006 ("Request for Further Waiver").

¹⁰ / *Order* at ¶ 16.

extend past the six month deadline because the PSAP is awaiting extended ALI provisioning into the selective router by the incumbent local exchange carrier. SouthernLINC Wireless has completed all of its Phase II provisioning work for these PSAPs, and they should be able to receive location data as soon as the extended ALI is available to them. In all cases, SouthernLINC Wireless remains in regular communication with PSAPs regarding Phase I and Phase II deployment and stands ready to take whatever steps it can to ensure that enhanced 911 services are made available as expeditiously as possible.

A chart summarizing SouthernLINC Wireless' deployment of E911 Phase I and Phase II service to PSAPs is provided as Attachment A. Pending Phase II requests are detailed in the chart enclosed as Attachment B.

Because SouthernLINC Wireless has chosen to deploy a handset-based solution to provide caller location data to PSAPs, it is currently capable of providing E911 Phase II service to any and all Phase 11-capable PSAPs in its service territory

B. Estimated Dates on Which Phase II Service Will Be Available to PSAPs Served by SouthernLINC Wireless' Network

As described above, SouthernLINC Wireless is capable of providing Phase II service to any requesting Phase 11-capable PSAP in its service territory. Estimated deployment dates for pending Phase II requests are provided in the chart enclosed as Attachment B.

C. Status of Coordination Efforts With PSAPs for Alternative Handset Penetration Dates

SouthernLINC Wireless remains in constant communication with all PSAPs in its territory regarding E-911 services, its ability to provide Phase I and Phase II service, and any problems that may arise that affect service availability. These communications may

be written or verbal, and they include information on SouthernLINC Wireless' ability to provide Phase II service to its customers and the degree to which its customers can benefit from Phase II capabilities. SouthernLINC Wireless' 911 services coordinator interacts with the 911 community on a regular basis, including attending meetings where she provides verbal updates on SouthernLINC Wireless' Phase II deployment status. Depending on the nature of the meeting, such information may be provided to all attendees in the form of a general announcement or may be targeted to interested parties in specific discussions.

Since the submission of SouthernLINC Wireless' 1st Quarter 2007 Report,¹¹ the 911 services coordinator has provided updates at the Northwest Alabama E911 Directors Meeting (February 8, 2007), the Alabama Association of 911 Directors Legislative Meeting (February 9, 2007), and the Alabama NENA Quarterly Meeting (April 26, 2007).

As described in its previous quarterly status reports, SouthernLINC Wireless has undertaken a communications program for Phase II-capable PSAPs in its service territory focusing on the customer handset penetration issue.¹² Specifically, SouthernLINC Wireless is providing these PSAPs with regular updates every two months via U.S. mail on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the goal of ninety-five percent penetration of location-capable handsets. The most recent of these written updates was sent to PSAPs on April 16, 2007.

¹¹ / SouthernLINC Wireless E911 Phase II Quarterly Report: February 1, 2007, CC Docket No. 94-102, filed Feb. 1, 2007 ("1st Quarter 2007 Report").

¹² / *See, e.g., Id.* at 6.

In addition, SouthernLINC Wireless always provides PSAPs with written confirmation of Phase II implementation once all activities, including testing, have been completed. These communications also include information on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the ninety-five percent penetration goal. These PSAPs will also receive the regular mail updates described above.

D. Efforts to Encourage Subscribers to Upgrade to Location-Capable Handsets

To communicate with customers about E-911 services and capabilities, SouthernLINC Wireless launched a twice-quarterly bill message communications plan in 2006 to provide information to its customers about E-911, and is continuing this program in 2007 with a revised bill message. The text of the revised bill message is provided as Attachment C. This bill message is designed to draw customers' attention to the issue of wireless E-911 service – as well as the need for an A-GPS-capable phone – and send them to a dedicated area on the SouthernLINC Wireless website for more details on E-911 services, including the availability of basic, Phase I, and Phase II services across SouthernLINC Wireless' service territory and information on which handset models are location-capable. A link to information on SouthernLINC Wireless' current handset promotions is also featured at this location so that customers can make decisions on handset upgrades, should they choose to do so. This section of the website was launched in early February 2006.

In the second quarter of 2006, SouthernLINC Wireless also added a message about A-GPS handsets and 911 service to its “on hold” message at its customer support center, providing customers with another avenue from which to learn about the

importance of location capabilities in emergency situations. The “on hold” message program is continuing through 2007.

In addition to the customer communications measures described above, SouthernLINC Wireless has also undertaken numerous aggressive efforts to increase customer adoption of location-capable handsets as rapidly as possible, as described in its Compliance Plan, which was filed with the Commission on May 3, 2006,¹³ as well as in previous quarterly status reports¹⁴ and the Request for Further Waiver. SouthernLINC Wireless notes that many of these efforts – such as customer calling and direct-mail campaigns, direct customer outreach programs, numerous offers of free phones and heavily discounted phones, rebates, free accessories, and offers of free services (including free minutes and a month of free location/navigation services) – have also been taken by other carriers and cited to approvingly by the Commission.” For example, efforts undertaken by SouthernLINC Wireless include:

- Providing customers multiple options for restoring location-capability to handsets affected by the July 2004 A-GPS software problem, including reprogramming of customer handsets at any SouthernLINC Wireless sales office and at some Southern Company utility offices, the distribution of free “self-update kits,” making available the ability to download the

¹³ / *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, SouthernLINC Wireless E911 Phase II “Compliance Plan,” filed May 3, 2006, at 6 – 9. SouthernLINC Wireless hereby incorporates its Compliance Plan by reference.

¹⁴ / *See, e.g.*, 1st Quarter 2007 Report; *See also* SouthernLINC Wireless E911 Phase II Quarterly Report: November 1, 2006, CC Docket No. 94-102, filed Nov. 1, 2006.

¹⁵ / *See, e.g.*, *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Location-Capable Handset Penetration Deadline by Sprint Nextel Corporation*, CC Docket No. 94-102, Order, FCC 06-183 (rel. Jan. 5, 2007) (“*Sprint Nextel Waiver Order*”), ¶ 32 (citing examples of aggressive efforts by Tier III carriers, including free and discounted phones, free minutes, a month of free service, customer calling campaigns, etc.).

necessary software for free over the Internet, and offering free replacement phones to government customers with no strings attached.

- Holding “Customer Appreciation Days” where customers were invited to the SouthernLINC Wireless booth at various trade shows, government conferences, fairs, and other community events, in order to have their handsets rebanded and reflashed, and to persuade other subscribers using incentive offers to upgrade their phones to A-GPS-capable handsets.
- Holding a three-day “Call the Customer” campaign that reached several thousand existing SouthernLINC Wireless customers.
- Dispatching SouthernLINC Wireless service technicians on free site visits to customers with twenty or more handsets (*i.e.*, enterprise and government customers) in order to carry out rebanding and A-GPS upgrades.
- Offering a variety of promotions throughout the past two-plus years providing customers who upgrade with free handsets, heavily discounted handsets, rebates, etc. For example, one promotion provided customers with a choice of three different location-capable phones, each of which was free with a mail-in rebate, and another promotion offered a new A-GPS-capable phone for only \$9.99 with a second one for free. SouthernLINC Wireless has applied these incentives and promotions across its entire range of handset models and price points in order to persuade as many customers as possible to upgrade to location-capable phones.
- Holding a direct-mail campaign targeting all known subscribers without E911 Phase II compliant phones. The letter sent to these customers urged them to act and upgrade to A-GPS-capable phones in order to receive the additional safety benefits that these phones may provide. The letter also included upgrade incentives such as offers of free phones (after rebate) and free minutes. This letter was followed up with a calling campaign to these customers.
- Offering customers a free 30-day trial of SouthernLINC Wireless’ “Tele Nav 10” location service, which requires an A-GPS-capable phone and thus provides yet another reason to upgrade to a location-capable handset.
- Launching BlackBerry service and offering a \$50 mail-in rebate for customers who upgrade to a BlackBerry handset (which is A-GPS-capable). While subscriber uptake of the Phase II compliant BlackBerry devices will include customers that already have compliant handsets, SouthernLINC Wireless believes that the opportunity to receive BlackBerry service (along with a rebate) will persuade a portion of those

customers still using legacy non-AGPS phones to upgrade to an A-GPS-capable BlackBerry.

In addition to these efforts, SouthernLINC Wireless, working with Motorola, completed a large-scale audit in January 2007 of handsets currently activated on SouthernLINC Wireless' network in order to specifically identify individual handsets affected by the A-GPS software defect that must still be reflashed or upgraded in order to restore their location capability. This audit process is described in more detail in SouthernLINC Wireless' 1st Quarter 2007 Report and in its Request for Further Waiver.¹⁶ This audit demonstrated that SouthernLINC Wireless had been far more successful than it previously realized in increasing the level of penetration of location-capable handsets among its subscribers", and the information compiled as a result of this audit will allow SouthernLINC Wireless to focus its resources and engage in more targeted outreach, promotional, and marketing efforts in order to achieve full compliance as quickly as possible.

Since SouthernLINC Wireless filed its last quarterly report on February 1, 2007, it has both planned and undertaken additional measures to achieve E911 Phase II compliance, including:

- SouthernLINC Wireless is preparing to launch a targeted program on or about June 1, 2007, to offer free A-GPS-capable phones to customers with older non-location-capable phones without requiring any renewal or extension of their existing contract. This program is described in more detail in Section II.F. below.
- e SouthernLINC Wireless will be implementing a program for its direct-sale stores to give a free A-GPS phone with no contract extension to any customer with an older, non-A-GPS handset.

¹⁶ / 1st Quarter 2007 Report at 10 – 12; Request for Further Waiver at 17 – 19.

¹⁷ / 1st Quarter Report at 10 – 12.

- On April 26, 2007, SouthernLINC Wireless sent a special “Premier Advantage” mailer about A-GPS targeting customers indicated in SouthernLINC Wireless’ records as having non-A-GPS-capable handsets. This mailer also described certain promotional offers for customers who upgrade their handsets, including an offer of a free accessory with a handset upgrade. A copy of this mailer, which was sent to approximately 9,000 customers, is provided as Attachment D.
- SouthernLINC Wireless is planning to run a text message campaign in May 2007 specifically targeting customers indicated in SouthernLINC Wireless’ records as having non-A-GPS-capable handsets. The message will state “When dialing 911, A-GPS may be a real life saver. Is your phone A-GPS capable? Go to *survey.southernlinc.com* for answers.” The message will include a two-question survey that will (1) identify whether the customer is using an older 32K SIM card in a newer A-GPS-capable phone (if so, the customer’s handset is in compliance and should be added to the company’s overall A-GPS penetration numbers); and (2) point the customer to the section of SouthernLINC Wireless’ website that describes the benefits of upgrading to an A-GPS-capable handset and provides special offers to customers who upgrade.
- In the second quarter of 2007, SouthernLINC Wireless’ handset promotions include a “buy-one-get-one-free” offer on eight different handset models from across its entire range of price points. Existing customers can also take advantage of this offer.
- In addition to continuing its offer of a \$50 mail-in rebate on BlackBerry handsets, SouthernLINC Wireless is offering a special service package for customers who upgrade to a BlackBerry. This package consists of a new Blackberry handset and a special discounted service plan that consists of 750 “anytime” cell minutes, unlimited night and weekend minutes, unlimited cellular mobile-to-mobile minutes, unlimited “InstantLINC” push-to-talk mobile-to-mobile calling, unlimited data service, unlimited incoming text messaging, and nationwide long distance. Customers who agree to a two-year service term will also receive an instant \$50 discount on the Blackberry handset and one month of free service. SouthernLINC Wireless believes that this BlackBerry service package will persuade a portion of those customers still using legacy non-A-GPS phones to upgrade to an A-GPS-capable BlackBerry.
- SouthernLINC Wireless has extended through the second quarter of 2007 a data service promotion that provides customers with a free 30-day trial of SouthernLINC Wireless’ “Tele Nav 10” location service. This service requires an A-GPS-capable phone, thus providing customers yet another reason to switch handsets.

- A-GPS outreach efforts are being incorporated into SouthernLINC Wireless' "Movies Under the Stars" program, a series of free outdoor screenings of family-friendly movies in communities in SouthernLINC Wireless' service area. These events, which include giveaways, radio station visits, and more, provide an opportunity for SouthernLINC Wireless representatives to interact directly with customers to describe and promote the benefits of A-GPS and encourage upgrades to A-GPS-capable handsets. Additional information about the "Movie Under the Stars" program is available on SouthernLINC Wireless' website at <http://www.southernlinc.com/movies/index.asp>.
- SouthernLINC Wireless will be attending and setting up booths at various trade shows and government conferences attended by SouthernLINC Wireless business and government customers in order to describe and promote the benefits of A-GPS and encourage upgrades to A-GPS-capable handsets, including through special upgrade incentives. SouthernLINC Wireless anticipates participating in at least 10 such events over the next three months.
- SouthernLINC Wireless will be conducting additional customer calling campaigns specifically targeting those customers indicated in SouthernLINC Wireless' records as having non-A-GPS-capable handsets. The next calling campaign is planned for the end of the second quarter.

E. Percentage of Customers With Location-Capable Handsets

Approximately 85 percent of SouthernLINC Wireless customers currently use location-capable handsets.

F. Status in Achieving Compliance

Although SouthernLINC Wireless faces numerous challenges in its efforts to achieve ninety-five percent penetration of location-capable handsets among its subscribers, it is committed to achieving full compliance as quickly as possible and has made significant progress towards this goal. As a result of the variety of outreach, promotional, and marketing efforts it has undertaken, SouthernLINC Wireless has succeeded in increasing its level of penetration of location-capable handsets from approximately forty-three percent on October 31, 2005, to approximately 85 percent as of May 1, 2007 – a level of success that only recently became apparent, as described in

Section II.D. above. SouthernLINC Wireless is now building on these positive results in order to further accelerate customer adoption of location-capable handsets through additional promotional and outreach measures such as those described in Section II.D. above.

Many of SouthernLINC Wireless' compliance efforts compare favorably to the efforts of other Tier III carriers cited in previous Commission Orders.¹⁸ These efforts, which are described in more detail in Section II.D. above, include customer calling and direct-mail campaigns, direct customer outreach programs, numerous offers of free phones and heavily discounted phones, rebates, free accessories, and offers of free service (including free minutes, a month of free location/navigation services, and a month of free data/Internet access service).

SouthernLINC Wireless is also preparing to launch a targeted program in which it will offer free A-GPS-capable phones to certain customers with older non-location-capable phones without requiring *any* renewal or extension of their existing contract. In order to make this program even more attractive – and thus provide even greater incentive for these customers to upgrade their phones¹⁹ – SouthernLINC Wireless is developing a program to match the models of non-location capable phones used by these

¹⁸ / See, e.g., *Sprint Nextel Waiver Order* at ¶ 32.

¹⁹ / As SouthernLINC Wireless described in its initial Request for Waiver, its efforts to restore location-capability to customers in the wake of the July 2004 A-GPS software defect included an offer to government customers of a free replacement phone furnished directly by Motorola with no strings attached. However, fewer than one percent of SouthernLINC Wireless' eligible customers chose to take advantage of this offer. See Request for Waiver at 21 – 22. Because this illustrated that the decision to replace or upgrade a handset was not necessarily a question of handset cost or contract commitment, SouthernLINC Wireless felt it necessary to spread its limited resources across additional programs as well, such as customer outreach and customer education regarding E911 and the advantages of A-GPS capability.

customers and customer classes to comparable replacement A-GPS models. This way, SouthernLINC Wireless may be able to offer these customers a replacement phone that more closely matches the features and capabilities of their current phone, thus increasing the likelihood that the customer will be willing to replace their non-location-capable handset with a new A-GPS-capable handset. The planning for this program is nearly complete, and SouthernLINC Wireless plans to begin extending offers to customers under this program on or about June 1, 2007.

As part of this program, SouthernLINC Wireless will be arranging for its direct-sale stores to give a free A-GPS phone with no contract extension to any customer with an older, non-A-GPS handset. This is expected to increase the penetration of A-GPS handsets among subscribers who now have non-compliant handsets.

Many of SouthernLINC Wireless' offers of free or heavily discounted iDEN handsets have included a two-year contract commitment due to the impact of the relevant subsidies involved. Furthermore, based on previous experience, SouthernLINC Wireless lacked clear evidence of a direct correlation between a contract extension requirement and a customer's decision whether to upgrade to a new location-capable handset.²⁰ However, SouthernLINC Wireless is currently revisiting its policy on contract renewals. Accordingly, in addition to the targeted "no contract extension" offer that will be launched in June 2007 and the related direct-store handset replacement program, all existing customers can now take advantage of SouthernLINC Wireless' current "buy-one-get-one-free" offer on eight different handset models from across its entire range of price points if they agree to extend their contract by as little as one year, rather than two

²⁰ / See note 19 above regarding SouthernLINC Wireless' previous experience with a free phone/no contract extension program.

years. Customers interested in the special BlackBerry service package described in Section II.D. (with unlimited data, etc.) will also have the option of selecting either a one-year or two-year service plan.

SouthernLINC Wireless believes that it will be able to achieve the ninety-five percent penetration level and will continue to put forth substantial effort and resources into doing so. However, SouthernLINC Wireless is not able to make a determination at this time as to whether it is on track to meet its revised compliance deadline of November 12, 2007. As described in Section II.D. above and in the 1st Quarter 2007 Report, the recent audit of handsets thought to have been affected by the 2004 software defect has resulted in a significant change in SouthernLINC Wireless' understanding of its overall compliance picture. Specifically, SouthernLINC Wireless has learned that its overall compliance level is substantially higher than it had previously realized and that it is no longer necessary to dedicate resources to efforts directed at a substantial segment of its customer base (*i.e.*, those customers with handsets affected by the 2004 **A-GPS** software defect) that, as a result of the audit, is now known to be compliant.

These are very positive developments, and the results of the January 2007 audit have given SouthernLINC Wireless the opportunity to refocus its resources and develop new, more targeted programs – such as those described in this Report – to achieve compliance. However, because these new programs have only recently been implemented or are just now going into effect, it is still too soon for SouthernLINC Wireless to be able to determine what the impact of these programs will be or to be able to extrapolate a revised schedule based on these programs and SouthernLINC Wireless' revised compliance data. Nevertheless, SouthernLINC Wireless will continue to pursue

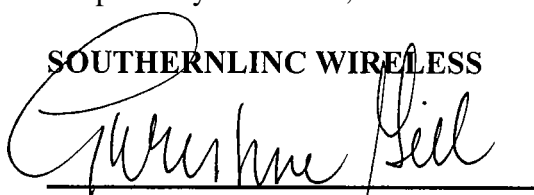
these and other aggressive efforts to achieve ninety-five percent penetration as quickly as possible and, as it develops additional data, will keep the Commission advised as appropriate as to its progress in achieving full compliance.

III. CONCLUSION

As demonstrated above, SouthernLINC Wireless is continuing to put forth substantial effort and resources into migrating as much of its subscriber base as possible to location-capable handsets, and it is committed to achieving full compliance with the Commission's handset penetration requirement as quickly as possible.

Respectfully submitted,

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Dated: May 1, 2007

ATTACHMENT A

E911 Phase I and Phase II Deployment to PSAPs

SouthernLINC Wireless External Affairs

Project Update

Last Reviewed: 4/30/2007

911 Deployments

Status as of April 30, 2007		Phase 1 Requests					Phase 2 Requests				
911 Implementation	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2007 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2007 Deployments	Total Past Deployment Deadline
AL	83	72	0	72	3	0	52	3	49	3	0
FL	12	11	0	11	0	0	10	1	9	1	0
GA	179	100	1	99	9	0	59	5	54	7	0
MS	24	11	0	11	0	0	6	1	5	0	0
Total	298	194	1	193	12	0	127	10	117	11	0

Status as of December 31, 2006		Phase 1 Requests					Phase 2 Requests				
911 Implementation	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2006 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2006 Deployments	Total Past Deployment Deadline
AL	83	69	0	69	6	0	47	1	46	13	0
FL	12	11	0	11	4	0	10	2	8	2	0
GA	179	95	5	90	26	0	52	5	47	30	0
MS	24	11	0	11	3	0	6	1	5	2	0
Total	298	186	5	181	39	0	115	9	106	47	0

Status as of December 31, 2005		Phase 1 Requests					Phase 2 Requests				
911 Implementation	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2005 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2005 Deployments	Total Past Deployment Deadline
AL	83	63	0	63	2	0	34	1	33	8	0
FL	12	8	1	7	1	0	7	1	6	1	0
GA	179	67	3	64	23	0	23	6	17	12	0
MS	24	9	1	8	1	0	4	1	3	1	0
Total	298	147	5	142	27	0	68	9	59	22	0

ATTACHMENT B

Status of Pending E9 11 Phase II Requests

Phase 1 Sites

First Name	Last Name	Work Phone	PSAP Name	P1 6 Mo Deployment Due Date	P1 Deployment Scheduled Date
David	Moore	(912) 685-4600	Candler County GA 911	14-Aug-07	15-May-07

Phase 2 Sites

First Name	Last Name	Work Phone	PSAP Name	P2 6 Mo Deployment Due Date	P2 Deployment Scheduled Date
DeVane	Mason	(850) 875-8824	Gadsden County FL 911 (1)	26-Oct-06	2-May-07
Sue	Broadway	(601) 776-6089	Clarke County MS 911 (2)	13-Mar-07	2-May-07
Faye	Cooper	(912) 287-4335	Ware County GA 911 (3)	26-Mar-07	2-May-07
Beverly	Daniel	(256) 927-3911	Cherokee County AL 911 (4)	11-Jun-07	5-Jun-07
Tim	McArthur	(706) 635-8911	Gilmer County GA 911	18-Jun-07	7-May-07
Iris	Sermon	(205) 372-1911	Greene County AL 911	14-Aug-07	10-May-07
Rusty	Sanders	(706) 554-4623	Burke County GA 911	28-Aug-07	24-May-07
Heather	Walton	(251) 578-5911	Conecuh County AL 911	6-Sep-07	28-Jun-07
Trudy	McDevitt	(770) 467-4313	Spalding County GA 911	05-Oct-07	19-Jul-07
Julie	Rainey	(229) 431-2132	Dougherty County/City of Albany GA 911	23-Oct-07	24-Jul-07

Notes

- (1) PSAP will NOT be ready to deploy until after 4/30/07.
- (2) PSAP extended ALI unavailable until 5/1/2007.
- (3) PSAP extended ALI unavailable until 4/24/2007. PSAP will NOT be ready to deploy until 5/2/2007.
- (4) PSAP extended ALI unavailable until 6/1/2007.

ATTACHMENT C

Text of Bill Message Regarding A-GPS and E911

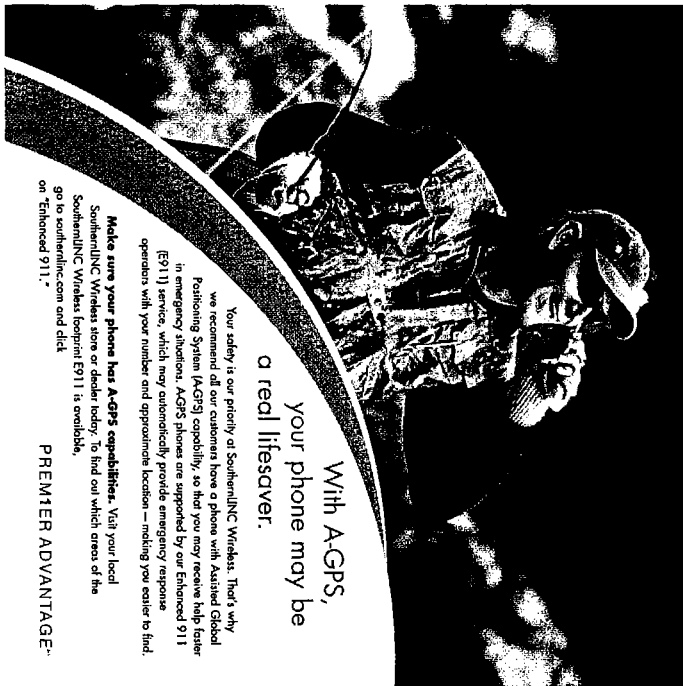
Text of Bill Message Regarding A-GPS and E911

When dialing 911 with A-GPS your phone may be a real lifesaver.

Customers should consider purchasing a phone with Assisted Global Positioning System (**A-GPS**) capability. When dialing 911, an A-GPS phone may automatically provide 911 operators with your number and approximate location – Wireless E911 Phase 2 service – making it easier and faster for emergency responders to find you. To make sure your phone has A-GPS capabilities, visit your local SouthernLINC Wireless store, dealer or call Customer Support at 1-800-406-0151 today. Wireless E911 Phase 2 service is only available if the applicable 911 Center has upgraded its equipment. To determine if your local 911 Center supports Wireless E911 Phase 2 service, go to southernlinc.com and click on “Enhanced 911.”

ATTACHMENT D

April 26, 2007 Mailer to Subscribers



With A-GPS,
your phone may be
a real lifesaver.

Your safety is our priority at SouthernLINC Wireless. That's why we recommend all our customers have a phone with Assisted Global Positioning System (A-GPS) capability, so that you may receive help faster in emergency situations. A-GPS phones are supported by our Enhanced 911 (E911) service, which may automatically provide emergency response operators with your number and approximate location — making you easier to find.

Make sure your phone has A-GPS capabilities. Visit your local SouthernLINC Wireless store or dealer today. To find out which areas of the SouthernLINC Wireless footprint E911 is available, go to southernlinc.com and click on "Enhanced 911."

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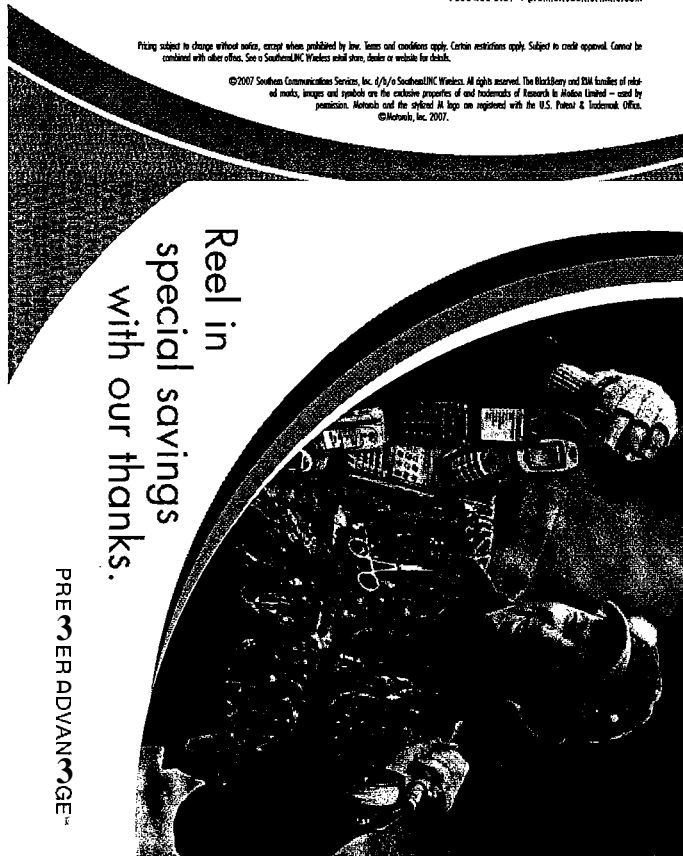
Look inside for "keeper" savings!

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